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*Attorneys for Defendants Janet Chubb,
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARC HARRIS, an individual; on behalf of
himself and all others similarly situated,

Plaintiffs,

v.

DEAN MEILING, an individual; MADYLON
MEILING, an individual; MEILING FAMILY
PARTNERS, LTD; JAMES PROCTOR, an
individual; JANET CHUBB, an individual;
TIFFANY SCHWARTZ, an individual;
CHEMEON SURFACE TECHNOLOGY LLC,
a Nevada Limited Liability Company; DSM
PARTNERS, LP, a Nevada Limited
Partnership; DSM P GP LLC, a Nevada Limited
Liability Company; ARMSTRONG
TEASDALE LLP, a Missouri Limited Liability
Partnership; KAEMPFER CROWELL, LTD., a
Nevada Professional Corporation; MERIDIAN
ADVANTAGE, and, unknown entity; SUITE B
LLC., a Nevada Limited Liability Company,
and DOES 1-100, inclusive,

Defendants.

AND ALL RELATED CLAIMS

Case No.: 3:19-cv-00339-MMD-CBC

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO COMPLAINT
(FIRST REQUEST)**

1 WHEREAS, on March 18, 2019, Plaintiff Marc Harris ("**Plaintiff**") filed a Complaint
2 against Defendants DEAN MEILING ("**Dean**"), MADYLON MEILING ("**Madylon**"),
3 MEILING FAMILY PARTNERS, LTD, JAMES PROCTOR, JANET CHUBB ("**Chubb**"),
4 TIFFANY SCHWARTZ ("**Schwartz**"), CHEMEON SURFACE TECHNOLOGY LLC
5 ("**Chemeon**"), DSM PARTNERS, LP ("**DSM Partners**"), DSM P GP LLC ("**DSMP**"),
6 ARMSTRONG TEASDALE LLP ("**Armstrong Teasdale**"), KAEMPFER CROWELL, LTD.,
7 MERIDIAN ADVANTAGE, and SUITE B LLC ("**Suite B**") in the Superior Court Orange
8 County Case No. 30-2019-01058061.¹

9 WHEREAS, on March 28, 2019, the Meiling Defendants filed a Notice of Removal with
10 the Unites States District court Central District of California Southern Division. (ECF No. 1).

11 WHEREAS, on April 25, 2019, Plaintiff filed an Amended Complaint. (ECF No. 10).

12 WHEREAS, on June 19, 2019, an Order Transferring Case to United States District
13 Court for the District of Nevada was filed. (ECF No. 33.)

14 Pursuant to Local Rule 6-1, Plaintiff and Defendants Chubb, Schwartz and Armstrong
15 Teasdale, by and through their respective undersigned counsel, hereby stipulate and agree that
16 Defendants Chubb, Schwartz and Armstrong Teasdale shall have up to and including July 18,
17 2019, to respond to Plaintiff's Amended Complaint. (ECF No. 10).

18 An extension is necessary to allow Defendants Chubb, Schwartz and Armstrong
19 Teasdale time to formalize their joint representation with Nevada counsel and to provide their
20 counsel adequate time to investigate and evaluate the allegations contained in the Amended
21 Complaint.

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26 ¹ Defendants Dean, Madylon, Chemeon, DSM Partners, DSMP, and Suite B shall be collectively
27 referred to as "**Meiling Defendants**."

1 This is the first request by Defendants Chubb, Schwartz and Armstrong Teasdale for an
2 extension of time to respond to the Amended Complaint. This request is made in good faith and
3 is not for the purpose of causing undue delay.

4 DATED this 2nd day of July, 2019.

5 **K&L LAW GROUP**

6 /s/ Marc Y. Lazo

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16 *Attorneys for Defendants Janet Chubb, Tiffany*
17 *Schwartz, and Armstrong Teasdale LLP*

18 IT IS SO ORDERED.

19 

20 UNITED STATES MAGISTRATE JUDGE

21 Dated: 7/5/2019

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2019, I caused a true and correct copy of the
**STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT (FIRST
REQUEST)** to be filed with the Clerk of the Court using the Court's CM/ECF system, and
service was thereby effected electronically to the following counsel:

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/s/ Rachel Jenkins

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